

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

LOWENA CLAY,

Plaintiff,

Case No.
Hon.

v

EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendant.

Lowena Clay
Pro Per Plaintiff
5911 Kensington Ave Upper
Detroit, MI 48224
(313) 623-0667

Tamara E. Fraser (P51997)
Williams, Williams, Rattner, & Plunkett, P.C.
Attorneys for Defendant Experian
380 N. Old Woodward, Suite 300
Birmingham, MI 48009
(248) 642-0333
tefraser@wwrplaw.com

NOTICE OF REMOVAL

Defendant Experian Information Solutions, Inc., by and through its attorneys, Williams, Williams, Rattner & Plunkett, P.C., for its Notice of Removal states the following:

1. On August 8, 2023, an action was commenced against Experian Information Solutions, Inc. (“Experian”) in the 36th District Court, Detroit,

Michigan. Copies of the Summons and Complaint filed in this cause and served upon Defendant Experian are attached hereto as Exhibit 1.

2. Upon information and belief, the Complaint was served upon Defendant Experian on August 11, 2023 thereby making this petition for removal timely.

3. This action is one in which this Court has jurisdiction under the provisions of Title 28, U.S. Code, §1331 in that it is an action arising under the laws of the United States, to wit: the Fair Credit Reporting Action. Pursuant to 15 USC §1681p, this Court has jurisdiction over this action without regard to the amount in controversy.

WHEREFORE, Defendant Experian prays that the above action now pending in the 36th District Court, Detroit, Michigan be removed therefrom to this Court.

Respectfully submitted,

WILLIAMS, WILLIAMS, RATTNER
& PLUNKETT, P.C.

Dated: August 24, 2023

By: /s/ Tamara E. Fraser
Tamara E. Fraser (P51997)
380 N. Old Woodward Avenue, Suite 300
Birmingham, Michigan 48009
(248) 642-0333
tefraser@wwrplaw.com
*Attorneys for Defendant Experian
Information Solutions, Inc.*

CERTIFICATE OF SERVICE

I, Tamara E. Fraser, hereby certify that on the 24th day of August, 2023, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system and by First Class Mail to the following:

Lowena Clay
5911 Kensington Ave Upper
Detroit, MI 48224

Respectfully submitted,

WILLIAMS, WILLIAMS, RATTNER
& PLUNKETT, P.C.

By: /s/ Tamara E. Fraser
Tamara E. Fraser (P51997)
380 N. Old Woodward Avenue, Suite 300
Birmingham, Michigan 48009
(248) 642-0333
tefraser@wwrplaw.com
*Attorneys for Defendant Experian
Information Solutions, Inc.*